

**IN THE UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF ILLINOIS**

Lennisha Reed, *et al.*,

Plaintiffs,

v.

Wexford Health Sources, Inc., *et al.*,

Defendants.

Case No. 3:20-cv-1139-SPM

**PLAINTIFF SUPPLEMENT TO MOTION TO COMPEL**

Plaintiffs, through their undersigned counsel, respectfully submit this supplement to their motion to compel, ECF 139.

Shortly after filing ECF 139, Plaintiff counsel received an email from Wexford counsel accusing him of making fabrications in the motion. Specifically, Wexford counsel states that during the September 14, 2023 call recounted in Plaintiff's motion to compel, *see id.* at 5-6, she never told Plaintiff counsel that Wexford executives “avoid” the use of email.

Wexford counsel is certainly correct that she did not use the term “avoid.” She told Plaintiff counsel that Wexford policymakers did not use email to discuss the *Lippert* reports, and instead communicated about the reports at meetings. The term “avoid” is Plaintiff counsel’s characterization. That characterization, Plaintiffs submit, is entirely fair. The *Lippert* reports were prepared by well-regarded, court-appointed medical experts. They contained hundreds of pages of detailed assessments of Wexford’s delivery of medical care, and noted various problems with the delivery of that care. It would be an extraordinary deviation from standard business practice for a company’s leaders neither to send or receive emails discussing such reports and yet to communicate about the reports only at meetings—unless a decision had been made to avoid communicating about the subject over email.

Respectfully submitted,

By: /s/ Stephen H. Weil

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